



Oregon

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June 7, 2012

Robert J. Wyatt
NW Natural
220 N.W. Second Avenue
Portland, OR 97209

**Subject: Draft Final Data Gaps Field Sampling Plan
NW Natural "Gasco" Site
ECSI #84**

Dear Bob:

The Department of Environmental Quality (DEQ) reviewed the "Field Sampling Plan, TPH Data Gaps Sampling, NW Natural Gasco Site" received via e-mail on May 29, 2012 (Draft Final Data Gaps FSP). Anchor QEA, LLC prepared the Draft Final Data Gaps FSP on behalf of NW Natural.

The Draft Final Data Gaps FSP provides the scope of work and technical approaches for collecting and analyzing samples from selected former manufactured gas plant (MGP) process and waste management areas on NW Natural's property (i.e., "Gasco Site"). Samples will be analyzed for MGP waste petroleum hydrocarbon ranges and constituents, and data-limited site-specific chemicals of interest (COI). The document also discusses how analytical results will be used to determine site-specific risk-based concentrations (RBCs) for MGP total petroleum hydrocarbons (TPH) and evaluate concentrations of MGP TPH and data-limited COI across the site. The results of data gaps sampling and analytical work will be incorporated into the human health (HHRA) and ecological (ERA) risk assessments for the Gasco Site.

NW Natural submitted the Draft Data Gaps FSP in August 2011¹. DEQ provided NW Natural comments on the Draft Data Gaps FSP in a letter dated October 25, 2011 that also requested the document be revised and resubmitted. Subsequent to meetings on November 18, 2011 and February 23, 2012, included related correspondence; NW Natural submitted the Revised Data Gaps FSP in March 2012². DEQ approved the Revised Data Gaps FSP subject to the document being revised consistent with comments and revisions indicated in a April 10, 2012 letter commenting on the document. NW Natural and DEQ further discussed the April 10th comments letter during a meeting on April 16, 2012 and a conference call on May 9, 2012. NW Natural submitted the Draft Final Data Gaps FSP based on agreements reached during the April 16th meeting and May 9th conference call.

¹ Anchor QEA, LLC, 2011, "TPH Fraction Data Gaps Field Sampling Plan for NW Natural Gasco Site," August (received August 12th), a sampling plan prepared on behalf of NW Natural.

² Anchor QEA, LLC, 2012, "Field Sampling Plan, TPH Data Gap Sampling, NW Natural Gasco Site," March (received March 12th), a sampling plan prepared for NW Natural.



The primary purpose of this letter is to inform NW Natural that DEQ approves the Draft Final Data Gaps FSP with comments. DEQ's comments either: 1) clarify information in the Draft Final Data Gaps FSP (i.e., do not involve revisions); or 2) request final changes to the document.

Section 1, last paragraph (provided for clarification). DEQ acknowledges that with completion of the data gaps sampling work described in the Draft Final Data Gaps FSP, data collection for purposes of the HHRA/ERA will likely be complete. For clarification, NW Natural should not understand this to mean additional sampling will not be conducted after completion of the HHRA/ERA. As indicated in DEQ's October 25, 2011 letter commenting on the Draft Data Gaps FSP and consistent with agreements made between NW Natural and DEQ in January 2011, the hot spot determination for the Gasco Site will be done separately and subsequent to completion of the HHRA/ERA. Also, as acknowledged by NW Natural additional sampling may be needed to support the uplands feasibility study (FS). Based on this information, DEQ anticipates additional sampling may be warranted to address the data needs of the hot spot determination and/or the FS.

Section 2, 1st paragraph. This paragraph should be revised to indicate that NW Natural and DEQ discussed the data gaps sampling program during a meeting on August 15, 2011. On behalf of NW Natural, Anchor presented the Draft Data Gaps FSP to DEQ during this meeting.

Section 2, 2nd paragraph (provided for clarification). As NW Natural knows, GeoEngineers will be observing data gaps sampling and collecting split samples for analysis on behalf of DEQ. Split samples will be analyzed consistent with the Draft Final Data Gaps FSP. However, besides the analytes listed in this paragraph, DEQ will request GeoEngineers to have the laboratory report data for polycyclic aromatic hydrocarbons (PAHs) in split samples. DEQ will use the PAH data to support our review of the HHRA/ERA. Additional information regarding reporting PAH data is provided in DEQ's May 10th and May 17, 2012 e-mails to NW Natural.

Section 2.3, Item #3. Consistent with our April 10, 2012 letter, DEQ requests the following changes be made to this item:

- The 5th bullet in the list should be replaced with, "Measured depth and thickness of intervals with visual evidence of MGP residuals."
- The 7th bullet in the list should be replaced with, "Measured depth and thickness of intervals of soil impacted by MGP residuals (to the extent practical)."

Section 5.1 (provided for clarification). Based on agreements reached during the May 9, 2012 conference call, sampling and analytical data for the composite samples collected from 0-3 feet below ground surface will be incorporated into the HHRA/ERA.

Section 5.2, 2nd paragraph. DEQ is reviewing the supplemental information NW Natural provided on May 29, 2012 regarding the proposed "proximity approach" for assigning data gaps sampling results to previously sampled locations. Consistent with DEQ's April 10, 2012 letter and agreements reached during the April 16, 2012 meeting, the proposed approach will be

incorporated into and addressed during DEQ's review of the Draft Risk Assessment Work Plan³. The second sentence should be revised to indicate that site-specific RBCs for MGP TPH will be assigned to existing data consistent with the Final Risk Assessment Work Plan.

Section 5.4 (provided for clarification). In addition to the copies of tables included in the Data Summary Report, DEQ requests the analytical results tables be provided as fully functional Excel-compatible spreadsheets.

NEXT STEPS

DEQ approves the Draft Final Data Gaps FSP with the revisions indicated in this letter. The Final Data Gaps FSP should be submitted to DEQ by Thursday June 14, 2012.

Please feel free to contact me with questions regarding this letter.

Sincerely,



Dana Bayuk
Project Manager
Portland Harbor Section

Cc: Patty Dost, Pearl Legal Group
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ECSI No. 84 File
ECSI No. 183 File

³ Anchor QEA, LLC, "Work Plan, Human Health and Ecological Risk Assessment, NW Natural Gasco Site," March (received March 22nd by e-mail), a work plan prepared for NWNatural.